

Petition No. 2004-0601-012-009

**CONSENT ORDER**

WHEREAS, the Department alleges that:

- WHEREAS, respondent, in consideration of this Consent Order, has chosen not to contest the above allegations at a hearing in front of the Board of Examiners for Nursing (hereinafter "the Board").

Respondent does not admit to having violated any statute or regulation, including but not limited to §20-99(b) of the General Statutes of Connecticut. Respondent further agrees that this Consent Order shall have the same effect as if ordered after a full hearing pursuant to §§19a-9, 19a-10, and 20-99(a) of the General Statutes of Connecticut.

NOW THEREFORE, pursuant to §19a-17 and §20-99(a) of the General Statutes of Connecticut, respondent hereby stipulates and agrees to the following:

1. Respondent waives her right to a hearing on the merits of this matter.
2. Respondent shall comply with all federal and state statutes and regulations applicable to her profession.
3. Respondent's license number 002595 to practice as an advanced practice registered nurse in the State of Connecticut is hereby reprimanded and placed on probation until she satisfies the provisions of paragraph 3C below pertaining to coursework, subject to the following terms and conditions:
  - A. Respondent shall provide a copy of this Consent Order to all current and future employers for the duration of her probation.
  - B. Respondent shall provide a copy of this Consent Order to any and all employers if employed as an advanced practice registered nurse during the probationary period. The Board and the Department shall be notified in writing by any employer(s) within fifteen (15) days of the commencement of employment as to the receipt of a copy of this Consent Order.
  - C. Within ninety (90) days of the effective date of this Consent Order, respondent shall attend and successfully complete an eighteen (18) hour course in prescribing practices.

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pre-approved by the Department. Within thirty (30) days of the completion of such coursework, respondent shall provide the Department with proof, to the Department's satisfaction, of the successful completion of such course.

- D. Respondent shall not prescribe any medications for herself, members of her family, or friends for the duration of the probationary period. For purposes of this agreement, "family" shall mean spouse, child, parent, sibling, father-in-law, mother-in-law, spouse of any sibling and/or children of any sibling or child.
- E. Respondent shall notify the Board and the Department in writing of any change of employment within fifteen (15) days of such change.
- F. Respondent shall notify the Board and the Department of any change in her home or business address within fifteen (15) days of such change.
- G. If respondent pursues further training or is engaged at the time of the implementation of the Consent Order, in an educational program in any subject area that is regulated by the Department, respondent shall provide a copy of this Consent Order to the educational institution or, if not an institution, to respondent's instructor. Such institution or instructor shall notify the Department of receipt of the Consent Order within fifteen (15) days of receipt.
- H. All correspondence and reports shall be addressed to:

Bonnie Pinkerton  
Department of Public Health  
Division of Health Systems Regulation  
410 Capitol Avenue, MS #12HSR  
P.O. Box 340308  
Hartford, CT 06134-0308

4. Any violation of the terms of this Consent Order without prior written approval by the Board shall constitute grounds for the Department to seek revocation of respondent's nursing license following notice and an opportunity to be heard.
5. Any extension of time or grace period for reporting granted by the Board shall not be a waiver or preclude the Board's right to take action at a later time. The Board shall not be required to grant future extensions of time or grace periods.
6. Legal notice of any action shall be deemed sufficient if sent to respondent's last known address of record reported to the Office of Practitioner Licensing and Certification of the Bureau of Healthcare Systems of the Department.
7. This Consent Order is effective on the first day of the month immediately following the month in which this Consent Order is approved and accepted by the Board.
8. Respondent understands this Consent Order is a matter of public record.
9. The Department's allegations as contained in this Consent Order shall be deemed true in any subsequent proceeding before the Board in which (1) her compliance with this same order is at issue, or (2) her compliance with §20-99(b) of the General Statutes of Connecticut, as amended, is at issue.
10. In the event respondent violates a term of this Consent Order, respondent agrees immediately to refrain from practicing as an advanced practice registered nurse, upon request by the Department, with notice to the Board, for a period not to exceed 45 days. During that time period, respondent further agrees to cooperate with the Department in its investigation of the violation, and to submit to and complete a medical, psychiatric or psychological evaluation, if requested to do so by the Department; and, that the results of the evaluation shall be submitted directly to the Department. Respondent further agrees that failure to cooperate with the

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15. The execution of this document has no bearing on any criminal liability without the written consent of the Director of the Medicaid Fraud Control Unit or the Bureau Chief of the Division of Criminal Justice's Statewide Prosecution Bureau.

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JP

I, Karen Potter, have read the above Consent Order, and I agree to the terms set forth therein. I further declare the execution of this Consent Order to be my free act and deed.

Karen Potter  
Karen Potter

Subscribed and sworn to before me this 25<sup>th</sup> day of May, 2005.

KRISTINE L. REISSIG  
NOTARY PUBLIC, STATE OF NEW YORK  
No. 01RE3059625  
Qualified in Onondaga County  
Commission Expires April 28, 2006

Kristine L. Reissig  
Notary Public or person authorized  
by law to administer an oath or affirmation

The above Consent Order having been presented to the duly appointed agent of the Commissioner of the Department of Public Health on the 26<sup>th</sup> day of May, 2005, it is hereby accepted.

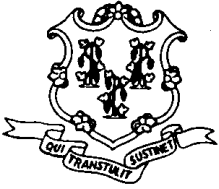
Marianne Horn  
Marianne Horn, Director,  
Division of Health Systems Regulation  
Bureau of Healthcare Systems

The above Consent Order having been presented to the duly appointed agent of the Connecticut Board of Examiners for Nursing on the 15<sup>th</sup> day of June, 2005, it is hereby ordered and accepted.

BY: Patricia C. Bufford  
Connecticut Board of Examiners for Nursing

S:LL/Potter/final

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# STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

July 21, 2005

Karen Potter, APRN  
209 Wilson Street  
Syracuse, NY 13203

Re: Consent Order  
Petition No. 2004-0601-012-009  
License No. 002595

Dear Ms. Potter:

Please accept this letter as notice that you have satisfied the terms of the above-referenced Consent Order, effective the date of this letter. Notice of such shall be sent to the Department's Licensure and Registration section.

Please be certain to retain a copy of this letter as documented proof that you have satisfied the terms of your Consent Order.

Thank you for your cooperation during this process.

Very truly yours,

A handwritten signature in cursive script that reads "Bonnie Pinkerton".

Bonnie Pinkerton, RN, Nurse Consultant  
Office of Practitioner Licensing and Investigations

cc: J. Filippone  
J. Wojick



Phone: (860) 509-7400  
Telephone Device for the Deaf (860) 509-7191  
410 Capitol Avenue - MS # 12HSR  
P.O. Box 340308 Hartford, CT 06134  
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